Revised – October 2024

COMMERCE ACQUISITION MANUAL
1372

DEPARTMENT OF COMMERCE
ACQUISITION MANAGEMENT REVIEW PROGRAM

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ACQUISITION MANAGEMENT REVIEW PROGRAM

SECTION 1 – OVERVIEW

1.1   Background

Pursuant to Department Organization Order 20-26, *Director for Acquisition Management*, and Office of Management and Budget (OMB) Circular A-123, *Management's Responsibility for Enterprise Risk Management and Internal Control,* the Director of the Office of Acquisition Management (OAM) is charged with strengthening the Department of Commerce's (Department) acquisition function and providing risk management and appropriate oversight in acquisition management to ensure compliance, effectiveness and integrity in acquisition processes. The Acquisition Management Review Program, which helps to identify and assess acquisition-related risks, internal controls, operational efficiency and effectiveness, is an element of the Department's acquisition risk management and oversight system.

To assist agencies in implementing and maintaining effective acquisition internal control and help determine where improvements can be employed, the Government Accountability Office (GAO) developed the *Framework for Assessing the Acquisition Function at Federal Agencies*[1] (GAO Framework)*,* which establishes the foundation for conducting acquisition assessments under OMB Circular A-123. The GAO Framework provides a systematic, organized, and structured approach to assessing entity level internal control for acquisition activities. To ensure that comprehensive and standardized reviews of the Department's acquisition function are conducted, OAM has developed an Acquisition Management Review Framework (Assessment Framework) that leverages guidelines set forth in the GAO Framework, and the Office of Federal Procurement Policy's (OFPP) Memorandum, *Conducting Acquisition Assessments under Office of Management and Budget Circular A-123*.

1.2   Purpose

The purpose of this Commerce Acquisition Manual Chapter is to set forth requirements for the Department's Acquisition Management Review Program.

1.3   Applicability

This policy is applicable to Department of Commerce Operating Units and Offices that have delegated procurement authority.[2]   This policy does not change the requirements prescribed in Commerce Acquisition Manual 1301.6, *Contracting Certification and Warrant Program* regarding acquisition management reviews of acquisitions processed by program officials with delegated contracting authority.

1.4   Policy

   1.4.1   The Office of Acquisition Management will conduct the following assessments of the Department's Operating Units and Offices that have delegated procurement authority:

   a.   Baseline Organizational Assessments and annual reassessments using the Maturity Assessment Model.

   b.   Compliance Reviews of acquisition actions, contracts, and purchase card transactions or Targeted Reviews a minimum of once every 36 months. More frequent reviews may be conducted based on risk.

   c.   Targeted Reviews, as needed.

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[1] The four cornerstones are described at length in OMB's memo dated May 21, 2008, entitled "Conducting Acquisition Assessments under OMB Circular A-123".

[2] The United States Patent and Trademark Office's (USPTO) internal policies should align with the Department's AMR program. While OAM will not conduct reviews of USPTO, USPTO is required to conduct internal Acquisition Management Reviews and submit copies of their results to OAM.

1.4.2   Senior Bureau Procurement Officials shall conduct the following internal self-assessments of their acquisition organizations.

   a.   Annual Organizational Assessments using the Maturity Assessment Model.

   b.   Compliance Reviews of acquisition actions, contracts, and purchase card transactions or Targeted Reviews a minimum of once every 36 months. More frequent reviews may be conducted based on risk.

   c.   Targeted Reviews, as needed.

1.5   Objectives

The primary objectives of the Department's Acquisition Management Review Program are to:

- Assess the overall operational efficiency and effectiveness of acquisition organizations;

- Assess acquisition workforce capacity and capability;

- Evaluate the integrity of acquisition systems and processes;

- Assess acquisition internal control and oversight processes; and

- Evaluate compliance with Federal and departmental acquisition-related statutes, regulations, and policies.

1.6   Acquisition Management Review Program

The Department's Acquisition Management Review Program includes three types of reviews/assessments that are performed at the Department and Operating Unit/Office levels. These reviews/assessments work together to provide an Assessment Framework that supports a comprehensive, integrated approach that is flexible and scalable and can be tailored to meet the Department's needs. The Assessment Framework includes organizational assessments, compliance reviews, and targeted reviews that provide an overall assessment of the health of an acquisition organization, by identifying best practices, opportunities for growth and improvement, and areas of risk. In addition, surveys and/or interviews[3] may be used to support assessments to help inform key areas such as customer engagement, leadership commitment, employee morale, career development, and knowledge management.

1.6.1   Organizational Assessments
Organizational Assessments are conducted to evaluate the four interrelated areas (i.e., cornerstones) that are essential to an efficient, effective, and accountable acquisition process: (1) organizational alignment and leadership; (2) policies and processes; (3) human capital; and (4) information management and stewardship.

1.6.2   Compliance Reviews
Compliance Reviews are conducted to evaluate acquisition actions, contracts, and purchase card transactions for conformance with Federal and Departmental acquisition-related statutes, regulations and policies.

1.6.3   Targeted Reviews
Targeted Reviews are conducted, as needed, to evaluate specific acquisition processes, subject areas, initiatives, or programs to address defined assessment objectives.

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[3] All feedback provided through surveys and during interviews remain confidential, and individual names are not associated with specific responses.

SECTION 2 – ROLES AND RESPONSIBILITIES

2.1   Senior Procurement Executive

The Senior Procurement Executive has overall responsibility for:

a. Establishing a process for monitoring the performance of acquisition activities and acquisition programs for the Department;

b. Ensuring effective oversight of acquisition programs and activities through assessment and reviews;

c. Determining the scope of acquisition assessments (i.e., acquisition activities and programs to be covered); and

d. Assessing the effectiveness of internal controls over the Department's acquisition activities and programs.

2.2   Senior Bureau Procurement Officials

Senior Bureau Procurement Officials are responsible for the following:

a. Ensuring that policies and processes are in place to implement the Department's Acquisition Management Review Program within their Operating Unit/Office;

b. Conducting annual Organizational Assessments of their acquisition organizations using the Maturity Assessment Model;

c. Conducting Compliance Reviews of acquisition actions, contracts and purchase card transactions or Targeted Reviews of their acquisition organizations at least once every 36 months;

d. Conducting targeted reviews, as needed;

e. Determining the frequency of assessments and reviews based on risk;

f. Ensuring that assessments and reviews are adequately documented and carried out in a thorough, effective, and timely manner;

g. Documenting and analyzing the results of assessments and reviews;

h. Submitting results of the annual Organizational Assessments, tri-annual Compliance Reviews, and Targeted Reviews to the Office of Acquisition Management.

i. Assigning a designated representative to serve as liaison for assessments and reviews conducted by the Office of Acquisition Management;

j. Developing and implementing corrective action plans to address any findings and recommendations identified in assessments and reviews;

k. Monitoring progress of corrective action plans and ensuring all corrective actions are completed as required; and

l. Nominating volunteers to participate in reviews conducted by the Office of Acquisition Management, if requested.

2.3   Office of Acquisition Management, Acquisition Oversight Division

The OAM Acquisition Oversight Division is responsible for:

a. Designating a Team Lead to manage each assessment and review conducted by the Office of Acquisition Management;

b. Conducting baseline Organizational Assessments and annual reassessments of each Operating Unit and Office that has delegated procurement authority, using the Maturity Assessment Model;

c. Conducting Compliance Reviews of acquisition actions, contracts and purchase card transactions or Targeted Reviews at least once every 36 months of each Operating Unit and Office that has delegated procurement authority;

d. Conducting Targeted Reviews, as needed;

e. Determining the frequency of assessments and reviews based on risk;

f. Ensuring that assessments and reviews are adequately documented and carried out in a thorough, effective, and timely manner;

g. Documenting and analyzing the results of assessments and reviews;

h. Evaluating proposed corrective action plans to determine if they address findings, recommendations and/or areas of concerns identified from assessments and reviews;

i. Monitoring progress of corrective action plans to ensure all corrective actions are completed as required; and

j. Requesting volunteers to participate on the AMR team, if needed.

END OF SECTION 2

SECTION 3 – ORGANIZATIONAL ASSESSMENTS

The Department's Assessment Framework includes Organizational Assessments to evaluate the overall acquisition function, focusing on four interrelated cornerstones: (1) organizational alignment and leadership; (2) policies and processes; (3) human capital; and (4) information management and stewardship. The cornerstones align with OMB Circular A-123 guidance and represent the broad areas identified by OFPP as having the greatest impact on the efficiency, effectiveness, and accountability of the acquisition process. To provide a comprehensive and structured approach for conducting Organizational Assessments, the Department has adopted a Maturity Assessment Model that encompasses element objectives, critical success factors, and evaluation criteria for each of the four cornerstones. The Maturity Assessment Model enables qualitative assessments of the acquisition function that identify areas of risk, opportunities for growth and improvement, and best practices.[4]

3.1   Maturity Assessment Model

The four cornerstones that serve as the foundation for conducting Organizational Assessments using the Maturity Assessment Model are described below. Each cornerstone consists of elements that are essential to the effectiveness and stewardship of the acquisition process. Each element is aligned to critical success factors that place emphasis on achieving desired outcomes, program results, and mission accomplishment, which collectively contribute to defining success for the associated element.

Assessment criteria for each critical success factor include control activities such as policies, processes, techniques, and mechanisms. The presence of critical success factors and associated control activities enhances the likelihood of fulfilling acquisition responsibilities and objectives and addressing related risks. This model provides a standardized framework that not only assesses current performance but also drives continuous improvement in the Bureau's acquisition operations. The elements and critical success factors linked to each cornerstone are summarized in Appendix C, *AMR Assessment Cornerstones Template FY2025.*

- *Cornerstone I: Organizational Alignment and Leadership*: Placement of the acquisition function to operate independently and strategically, the effectiveness of its leadership, and the extent to which roles and responsibilities of stakeholders are clearly defined.

- *Cornerstone II: Policies and Processes*: Implementation and effectiveness of policies and processes of the acquisition function and the extent to which they are accompanied by controls and incentives to ensure they are translated into practice.

- *Cornerstone III: Human Capital:* There is a commitment to human capital management that supports a workforce with the capability and capacity to achieve mission and performance goals.

- *Cornerstone IV: Information Management and Stewardship:* Data and tools are used to make well-informed acquisition decisions that have a direct impact on program and acquisition personnel who acquire, manage, and oversee acquisition resources.

The Maturity Assessment Model is designed to capture and rate the degree to which control activities are effectively applied to each cornerstone element and critical success factor, encouraging growth within the acquisition function. The model evaluates progress of each critical success factor within each of the four cornerstones, with maturity levels ranging from "Learning" to "Fully Optimized," as shown in Figure 1 below. The model is structured to demonstrate progression from one level of maturity to the next, where the criteria for each preceding level must be achieved before advancing to a higher level. This design is intended to foster continuous improvement and development. Appendix B, AMR – *Maturity Assessment Model Scoring Matrix* - FY2025 outlines each of the critical success factors and associated maturity level for each factor.

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[4] Although the model supports an integrated evaluation approach, each of the cornerstones can stand alone to enable a tailored, targeted assessment to address specific needs.

Figure 1 – MATURITY LEVELS	
Level	Scoring Scale
Learning	< 25% of potential points
Developing	25% of potential points
Established	26-50% of potential points
Mature	51-75% of potential points
Optimized	76-99% of potential points
Fully Optimized	100% of potential points

3.2 Maturity Assessment Model Process

3.2.1. Baseline Assessment

The Office of Acquisition Management will initiate Organizational Assessments by inviting each Operating Unit and Office with delegated procurement authority to use the Maturity Assessment Model evaluation criteria to conduct a self-assessment. To support the self-assessment rating, the Operating Unit/Office must submit artifacts i.e., documents that demonstrate evidence of maturity for each critical success factor as outlined in the Maturity Assessment Model. Each artifact must be clearly linked to a specific critical success factor(s).

The Office of Acquisition Management will use the documentation/artifacts provided and other readily available documentation/artifacts to conduct an independent preliminary assessment and rating. For critical success factors where the available documentation does not support the Operating Unit's/Office's self-rating, the Office of Acquisition Management will communicate the preliminary ratings and the rationale (e.g., gaps or missing artifacts) to the Operating Unit/Office. The Operating Unit/Office will be given an opportunity to provide additional documentation to address the gaps and better support their initial self-rating.

The Office of Acquisition Management will assess additional documentation provided by the Operating Unit/Office and determine a final rating. Any discrepancies between the Operating Unit's/Office's self-rating and the final rating will be discussed during the exit briefing and documented in the final assessment report.

3.2.2 Annual Assessments

Annually, the Office of Acquisition Management will review the elements, critical success factors and evaluation criteria of the Maturity Assessment Model for potential updates and/or changes to policies, processes, or other initiatives. No later than August 31st of each year, the Office of Acquisition Management will release an updated Maturity Assessment Model template for the next fiscal year, documenting changes.

The Office of Acquisition Management will request that each Operating Unit and Office use the updated Maturity Assessment Model template to conduct an annual self-assessment. Previous year's ratings will be pre-populated in the annual template, with the exception of those rating levels that are new or have changed. To support the annual self-assessment rating, the Operating Unit/Office must submit artifacts to support any proposed changes to the previous year's final ratings, changes to critical success factors and/or evaluation criteria that resulted from updates to the template, and any new elements, critical success factors, and/or evaluation criteria that were added to the updated template. Only new artifacts

need to be submitted; previous documents will be used, if applicable. When artifacts are required to be submitted, the documentation standards outlined in 3.2.1 apply.

The annual self-assessments, and supporting documentation (artifacts), must be submitted to the Office of Acquisition Management for independent assessment and rating no later than **January 15th** of each year via the OAM mailbox at: oam_mailbox@doc.gov.

The Office of Acquisition Management will use the documentation/artifacts provided and other readily available documentation/artifacts to conduct an independent preliminary assessment and rating. For critical success factors where the available documentation does not support the Operating Unit's/Office's self-rating, the Office of Acquisition Management will communicate the preliminary ratings and the rationale (e.g., gaps or missing artifacts) to the Operating Unit/Office and discuss the differences. The Operating Unit/Office will be given an opportunity to provide additional documentation to address the gaps and better support their annual self-rating.

The Office of Acquisition Management will assess additional documentation provided by the Operating Unit/Office and determine a final rating. Any discrepancies between the Operating Unit's/Office's self-rating and the final rating will be documented in the final annual assessment report.

END OF SECTION 3

SECTION 4 – COMPLIANCE REVIEWS

A key component of the Department's Assessment Framework is Compliance Reviews which include examining a representative sample of acquisition actions, contracts, purchase card transactions, policies and internal controls to assess conformance with Federal and Departmental acquisition-related statutes, regulations and policies.

4.1   Contract Compliance Reviews

Contract compliance reviews include assessments of control objectives, risks, and control activities covering activities and processes throughout the acquisition life cycle. Sample populations for contract compliance reviews shall be established to ensure a stratified population representative of diverse factors such as types of actions, dollar values, complexity, contract type, etc. To ensure a statistically valid sample, the size shall be generated based upon the population count, utilizing a 95% confidence level and 5% sampling error rate.

The following categories will be used to assess contract compliance reviews:

- *Strengths*: Proper application in support of the acquisition process, with no violations of statute, regulation, or policy; areas of excellence that can be shared across the Department to promote effectiveness and efficiency in operations; survey and compliance percentages above 70% positive ratings.

- *Observations*: Issues that, if not addressed, could negatively impact the acquisition function; issues that are generally not systemic but should be monitored, as addressing them could lead to better business practices or greater efficiency; process inefficiencies, minor technical noncompliance, or matters suggesting a need for policy clarification or updates; survey and compliance percentages ranging from 70-60% positive ratings.

- *Findings*: Significant deficiencies or recurring issues that require corrective action; systemic issues that relate to violations of statutes, regulations or policies; critical procedures which may pose risks to the Department if not promptly addressed; significant violations such as misuse of appropriations or failure to follow critical procedures (e.g., ratification processes); issues that could compromise the integrity of the procurement process; survey and compliance percentages below 60% positive ratings. All findings require corrective action.

4.2   Purchase Card Compliance Reviews

Purchase card compliance reviews include a review of a random sample of purchase card transactions to assess compliance with Federal and departmental acquisition-related statutes, regulations, policies, and guidance to identify suspicious and high-risk transactions, and identify trends and/or patterns. To the extent practicable, the charge card servicing bank's rules-based data mining systems shall be used to generate samples and disposition purchase card cases for review.

The following rating categories will be used to assess purchase card transactions:

- *Valid*: Transaction documentation provided is accurate and complete and the purchase complies with all statutory, regulatory, and policy requirements.

- *Valid with Administrative Discrepancy*: Transaction documentation is incomplete. Approval signatures are captured and transaction is for official government business, however, the transaction documentation is incomplete and/or all required documentation is not available.

- *Misuse*: Transaction appears to be [or is] for official government business; however, appropriate approval signatures and/or other statutory, regulatory, or policy requirements are not captured within the transaction documentation.

- Waste: Transaction appears to foster or result in unnecessary costs or other program inefficiencies.

- *Abuse*: Transaction appears to be [or is] for official government business; however, the purchase appears to be excessive (e.g., price, quantity, high-end products) and/or purchase is for a questionable Government need.

- *Fraud*: Transaction does not appear to be [or is not] for official government business and/or does not contain sufficient documentation to justify the purchase.

4.3   Frequency of Compliance Reviews

4.3.1   Departmental Compliance Review

The Office of Acquisition Management will conduct Compliance Reviews or Targeted Reviews of the Department's Operating Units and Offices that have delegated procurement authority a minimum of once every 36 months. More frequent reviews may be conducted based on risk.

In lieu of an independent compliance review, the Office of Acquisition Management may choose to assess an Operating Unit's/Offices internal compliance review conducted within the preceding 24 months to evaluate areas such as: the design and methodology; the scope and comprehensiveness of the review; the effectiveness of corrective actions taken to address findings; and compliance with Departmental standards.

4.3.2   Internal Compliance Reviews

Senior Bureau Procurement Officials shall conduct Compliance Reviews or Targeted Reviews of their acquisition organization a minimum of once every 36 months. More frequent reviews may be conducted based on risk. Results of internal compliance reviews should be used to evaluate technical compliance, the quality of procurement processes and management systems, and effectiveness of any corrective actions implemented**.**

END OF SECTION 4

SECTION 5 – TARGETED REVIEWS

Targeted Reviews are conducted to evaluate specific acquisition processes, subject areas, initiatives, or programs to address defined assessment objectives. These reviews are performed as needed, either with a specific acquisition office or across multiple acquisition offices and tailored to meet the specific objectives of the review. Targeted Reviews may include a combination of elements from the Organizational Assessment and Compliance Review processes**.** Therefore, the assessment objectives, scope, design, methodology, processes and results shall be adequately documented in final reports.

The scope and depth of Targeted Reviews will be determined by the Senior Procurement Executive for Department-level reviews and Senior Bureau Procurement Officials for internal reviews of their acquisition organization.

END OF SECTION 5

SECTION 6 – PROCEDURAL MATTERS

6.1   Acquisition Management Review Team

For Department-level assessments and reviews, the Acquisition Management Review Team Lead will determine the composition and size of the team. The team may include a representative from the Office of General Counsel, a Small Business Specialist, Cost/Price Analyst, and/or other individuals with specialized expertise to examine a specific focus area.

Senior Bureau Procurement Officials may be requested to nominate volunteers to participate on the team for assessments and reviews of their peer organizations. Nominees must be senior-level 1102 professionals possessing a minimum of five-years of operational contracting experience with sufficient depth and breadth of acquisition proficiency.

6.2   Advance Notification

The Office of Acquisition Management will issue an advance notification to Senior Bureau Procurement Officials for all Acquisition Management Review assessments and reviews. The notification will address the focus areas, scope and other requirements of the assessment or review, and provide a list of documents that must be submitted to the Office of Acquisition Management for analysis prior to commencement of the assessment or review (e.g., previous audit findings and associated corrective actions). If applicable, a list of contract files to be reviewed will be provided.

6.3   Entrance Briefing

With the exception of annual Organizational Assessments, at the commencement of an assessment or review, the Office of Acquisition Management will facilitate a briefing with the organization to be reviewed. The objectives and general scope of the assessment or review, notional timeline, and other relevant matters will be discussed during the entrance briefing. Senior Bureau Procurement Officials will have the opportunity to provide information pertinent to their organization that may assist in conducting the assessment or review.

6.4   Conducting Assessments and Reviews

The length of time required to perform an assessment or review will depend upon various factors including the size of the organization, sample population, volume of documentation, number of members on the review team, and the scope and depth of the review. Therefore, a notional timeline will be developed that considers the various factors.

During the assessment or review process, it may be necessary to engage with contracting and other personnel to gain clarification, understanding, and/or the rationale behind certain actions.

6.5   Progress Briefings

During an assessment or review, the Office of Acquisition Management may hold progress meetings with officials of the organization being assessed to discuss progress and identify issues being developed. During these meetings, officials are encouraged to express their views on the preliminary findings and to provide any information that may have been overlooked by the review team that could alter or impact final results.

6.6   Exit Briefing

With the exception of annual Organizational Assessments, upon completion of the assessment or review, the Office of Acquisition Management will conduct an exit briefing with the organization being reviewed to provide a high-level summary of preliminary results, including any findings and discrepancies in ratings, rationale for final ratings, and a summary of key points. The exit briefing serves as an opportunity to address any remaining questions or concerns and to discuss next steps in the process.

6.7   Reports

6.7.1 Draft Reports.

After the Exit Briefing, the Office of Acquisition Management will issue a draft report to the organization being reviewed for review and comment. The Senior Bureau Procurement Official must respond to the draft report within 30 calendar days of its issuance, providing comments and any additional information that may clarify or challenge the results. An extension may be granted if requested by the Senior Bureau Procurement Official and granted by the Senior Procurement Executive.

6.7.2 Final Reports.

The Office of Acquisition Management will review comments submitted in response to the draft report and make any necessary changes before finalizing the report. The Senior Procurement Executive will issue the final report to the Senior Bureau Procurement Official and provide a copy to the individual's supervisor. The final report communicates the results of the assessment or review and serves as a comprehensive record of the analysis, findings, and recommendations for enhancing the acquisition organization. The final report is an internal document, not for official publication.

END OF SECTION 6

SECTION 7 – CORRECTIVE ACTION PLANS

7.1   Corrective Action Plans

Senior Bureau Procurement Officials shall review final reports and prepare Corrective Action Plans to specifically address any findings and recommendations identified in the report. The Corrective Action Plan shall be submitted to the Office of Acquisition Management within **60 calendar** days after issuance of the final report. Corrective action plans must include specific actions that are realistic, actionable, and clearly address the identified issues and target completion dates.

The Office of Acquisition Management will evaluate proposed Corrective Action Plans to determine if actions adequately address the issues identified in the report. The Senior Bureau Procurement Official will be notified of the decision to either accept the action plan or request revision. Once the action plan is accepted, the Senior Bureau Procurement Official shall monitor progress to ensure actions are completed as required and provide quarterly updates to the Office of Acquisition Management. Corrective actions taken in response to assessments and reviews shall be assessed in subsequent Organizational Assessments, Compliance Reviews, and/or Targeted Reviews.

After the Office of Acquisition Management receives all supporting documentation and determines that all corrective actions have been adequately addressed and completed, the Senior Procurement Executive will issue a formal notification to the Senior Bureau Procurement Official to close out the assessment or review.

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APPENDICES

APPENDIX A: DEFINITIONS

Acquisition Management Review (AMR) - A comprehensive review that employs customized compliance checklists and specific review criteria to evaluate contract files, related processes, and internal controls. The AMR assesses compliance with applicable laws, regulations, and guidance; evaluates the effectiveness of the organization and management responsible for contract activities; and addresses additional ad hoc review functions as required. The AMR also includes the use of the AMR Maturity Assessment Model to evaluate the maturity of key acquisition functions across the four (4) Cornerstone areas prescribed in the Assessment Framework.

Artifacts – Artifacts refer to the documentation submitted as evidence by the Bureau during the AMR to support its self-assessment maturity level score within the Maturity Assessment Model. The artifacts demonstrate the Bureau's compliance with and progress towards achieving the critical success factors across the four cornerstone areas. Artifacts may include, but are not limited to, organizational charts, policy documents, training records, performance data, and internal reports. They are reviewed and validated by OAM to confirm the Bureau's self-score maturity level and to guide the final scoring in the AMR report.

Corrective Action - Actions intended to correct deficiencies or otherwise improve contract actions or contract management compliance based on identified weaknesses or findings. Corrective actions are designed to address the root causes of deficiencies and prevent their recurrence.

Corrective Action Plan - A detailed plan developed in response to AMR results that outlines specific corrective actions intended to address identified findings. The Corrective Action Plan includes timelines, corrective actions, and preventive measures to mitigate future risks. The Corrective Action Plan must be updated and tracked until all actions are completed and verified by OAM.

Maturity Assessment Model – A structured framework utilized during the AMR to evaluate and score the maturity of a Bureau's acquisition function. The basis of this model derives from the GAO Assessment Framework, which focuses on four cornerstone areas essential to a successful acquisition organization: Organizational Alignment and Leadership, Policies and Processes, Human Capital, and Information Management and Stewardship. The model measures the Bureau's progress across the following five maturity levels, each building upon the previous one to guide towards achieving an optimal acquisition organization: 1) Learning, 2) Developing, 3) Established, 4) Mature, and 5) Optimized. The model provides a standardized approach to assessing and advancing the maturity of the Bureau's acquisition function, ensuring continuous improvement and alignment with best practices.

Observations – Issues identified during an AMR that: 1) if not addressed, may result in problems that, while not necessarily systemic, should be corrected; 2) could lead to improved business practices if resolved; or 3) require OAM consideration for actions such as policy development, clarification, or updates. Observations generally do not require immediate corrective action but should be monitored to prevent escalation.

Recognitions – Formal acknowledgments issued in response to observed strengths during the AMR, recognizing best practices or exemplary performance in the acquisition function. Recognitions are intended to celebrate and promote successful initiatives that may serve as models for other Bureaus.

Recommendations – Specific actions proposed by the AMR team to address identified deficiencies or findings. Recommendations are intended to guide the development of the CAP and require timely implementation to mitigate risks to the acquisition function.

Strengths - Best practices or processes observed during the AMR that contribute to the effectiveness and efficiency of the acquisition function. Strengths often exceed standard expectations and demonstrate innovative or exemplary performance. These practices may be recognized as models for other Bureaus to follow.

Suggestions – Proposals for improving observations or enhancing efficiency and effectiveness, typically related to internal policies or procedures. While suggestions are encouraged, they are not mandatory, and implementation is at the discretion of the Bureau.

Weakness - Significant or material deficiencies in terms of impact or frequency, typically systemic, that require corrective actions. Weaknesses may pose risks to the Department if not promptly addressed and often relate to violations of regulations, policies, or critical procedures that could compromise the integrity of the procurement function. Weaknesses are synonymous to Findings.

APPENDIX B: AMR MATURITY ASSESSMENT MODEL SCORING MATRIX FY2025

APPENDIX C: AMR ASSESSMENT CORNERSTONES

CORNERSTONES	ELEMENTS	CRITICAL SUCCESS FACTORS
AMR ASSESSMENT CORNERSTONES TEMPLATE – FY2025		
Organizational Alignment and Leadership	(A) Aligning Acquisition with Agency Mission and Needs	1. Assuring Appropriate Placement of the Acquisition Function. 2. Organizing the Acquisition Function to Operate Strategically. 3. Clearly Defining and Integrating Roles and Responsibilities.
	(B) Commitment from Leadership	1. Clear, Strong and Ethical Executive Leadership. 2. Effective Communication and Continuous Improvement. 3. Effective Risk Management
Policies and Processes	(A) Planning Strategically	1. Partnering with Internal Organizations. 2. Assessing Internal Requirements.
	(B) Effectively Managing the Acquisition Process	1. Empowering Cross-Functional Teams. 2. Managing and Engaging Suppliers. 3. Monitoring and Providing Oversight to Achieve Desired Outcomes. 4. Enabling Financial Accountability. 5. Managing and Providing Oversight of the Purchase Card Program.
	(C) Promoting Successful Outcomes of Major Projects	1. Using Sound Capital Investment Strategies. 2. Employing Knowledge-Based Acquisition Approaches.
	(D) Policies are Being Developed that Effectively Manage the Acquisition Process	1. Developing Effective Policy
Human Capital	(A) Valuing and Investing in the Acquisition Workforce	1. Commitment to Human Capital Management. 2. Role of the Human Capital Function.
	(B) Strategic Human Capital Planning	1. Integration and Alignment. 2. Data-Driven Human Capital Decisions.
	(C) Acquiring, Developing, and Retaining Talent	1. Targeted Investments in People. 2. Human Capital Approaches Tailored to Meet Organizational Needs.
	(D) Creating Results-Oriented Organizational Cultures	1. Empowerment and Inclusiveness. 2. Unit and Individual Performance Linked to Org Goals. 3. Enabling an Innovative Culture.
Information Management & Stewardship	(A) Identifying Data and Technology that Support Acquisition Management Decisions	1. Tracking Acquisition Data. 2. Translating Financial Data into Meaningful Formats. 3. Analyzing Goods and Services Spending.
	(B) Safeguarding the Integrity of Operations and Data	1. Ensuring Effective General and Application Controls. 2. Data Stewardship.